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# Group Complaints Management Policy

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## Table of Contents

- Policy Number ..... 2
- Version Control ..... 2
- Purpose ..... 3
- 1. Scope ..... 3
- 2. Definitions..... 3
- 3. Policy Statement ..... 4
- 4. Policy Outline..... 4
- 4.1 Channels to log complaints received ..... 4
- 4.2 Making a Complaint ..... 5
- 4.3 Escalation Process and Criteria ..... 6
- 4.4 Investigating Complaints ..... 6
- 4.5 Resolving Complaints ..... 7
- 4.6 Service Recovery ..... 7
- 4.7 COMMUNICATING WITH REGULATORY/EXTERNAL BODIES ..... 8
- Bank of Jamaica - Requirements ..... 8
- 5. Risk Management Considerations ..... 9
- 4. Roles and Responsibilities..... 9
- 5. Related Policies, Law and Regulation ..... 10
- 6. Compliance and Monitoring..... 10
- 7. Non-Compliance ..... 11
- Review and Updates ..... 11
- Effective Date and Review Cycle ..... 11
- Approval..... 11
- Appendices ..... 12
- Appendix 1 ..... 12
- Appendix 2 ..... 12
- Appendix 3 ..... 13
- Appendix 4 ..... 13
- Appendix 5 ..... 13

## Group Complaints Management Policy

### Policy Number

POL\_Group Complaints Management Policy

### Version Control

| <b>Version</b> | <b>Date</b> | <b>Author</b>   | <b>Changes</b>   |
|----------------|-------------|---|--|
| 1.0            | May 2023    | Sharon Williams, Head<br>Customer Experience                          | Amendments and Incorporation of<br>BOJ Requirements  |
| 1.2            | April 2026  | Misha Rae<br>Manager, Digital Client<br>Experience and Contact Centre | <ul style="list-style-type: none"><li>• Review of overall policy and format based on guidance from Bank of Jamaica</li><li>• Amendments to include Complaints routed through Manage My Card Portal</li><li>• Update to customers being emailed on the date of breach rather than 2 days prior</li><li>• Inclusion of updated SLAs</li><li>• Update of complaints management flow</li></ul> |

### Purpose

The Complaints Management policy establishes a unified framework for managing complaints across all entities of National Commercial Bank Jamaica Limited (NCBJ) and its subsidiaries (collectively referred to as NCB Group). It ensures adherence to regulatory requirements, promotes service excellence, and strengthens trust through transparent complaint resolution.

This document is based on: - The Banking Services (Deposit-Taking Institutions) (Customer Related Matters) Code of Conduct, 2016 - The Credit Reporting Act, Bank of Jamaica (BOJ) Guidelines and Internal service standards outlined in the NCB Customer Service Manual ([Appendix 1](#)).

To operationalize this framework, NCB Group has implemented a centralized Customer Relationship Management platform (CRM), (Microsoft Dynamics, Sales & Service Management System (SSMS) or Complaints, Service Request and Referral Portal (CSR Portal) for the logging, investigation, and resolution of complaints across all business lines.

#### 1. Scope

This policy applies to all:

- Employees, contractors, and partners of the NCB Group
- Customer complaints received via any channel (branches, digital platforms e.g. Manage my card portal, NCB Assist etc), contact centre, written correspondence, email, or traditional or social media)
- Customer complaints regarding all banking and investment services.

#### 2. Definitions

**Complaint:** Any expression of dissatisfaction about a product, service, employee, or process, formally logged in the Customer Relationship Management (CRM) Platform.

**Customer Relationship Management (CRM):** The centralized platform used to log, track, escalate, and resolve complaints. The CRM used is Microsoft Dynamics also referred as Sales and Service Management System (SSMS) or Complaints, Service Request and Referral Portal (CSR Portal). This platform is the single source of truth for all complaints.

**L2 Complaint** - L2 complaint handling process typically refers to the escalation of a customer complaint that could not be resolved at the initial (Level 1) stage. This process is more structured and often involves more specialized teams.

**Support Unit/Resolving Unit (L3):** Specialized units responsible for more technical complaint investigation and resolution. List of supporting units may be found in [Appendix 2](#).

**Service level Agreement:** refers to the agreed-upon timeframe or performance standard within which a complaint should be acknowledged, investigated, and resolved. It's a key metric used to ensure consistency, accountability, and customer satisfaction.

**First Contact Resolution (FCR):** Complaints resolved at the first point of contact without escalation.

**Escalation** – the process of referring unresolved complaints to higher levels for resolution.

### 3. Policy Statement

NCB Group is committed to:

- Ensuring all complaints are acknowledged within 24 hours.
- Logging complaints in the Customer Relationship Management platform
- Meeting regulatory Service Level Agreements (45 business days)
- Reporting and auditing complaint data to improve service delivery

### 4. Policy Outline

Complaints can be managed:

1. At point of service- **First Contact Resolution (FCR)**
2. Through the structured **Complaints Management Process** ([Appendix 3](#))
3. Through escalation to the **complaints management team** (L2) within the Client Experience Unit

#### 4.1 Channels to log complaints received

All employees of the NCB Group shall ensure that complaints are appropriately logged using our CRM.

Complaints may be shared with the organization from customers via the following channels:

1. The Customer Care Centre (888-622-3477)
2. The NCB One Number (876-929-4622)
3. Email to:
  - a. [CEM@jncb.com](mailto:CEM@jncb.com)
  - b. [Complaintmanagementgroup@jncb.com](mailto:Complaintmanagementgroup@jncb.com)
  - c. [Ncbinfo@jncb.com](mailto:Ncbinfo@jncb.com)
  - d. [ncbcmcomplaintsgroup@jncb.com](mailto:ncbcmcomplaintsgroup@jncb.com)

## Group Complaints Management Policy

- e. [ncbia@jncb.com](mailto:ncbia@jncb.com)
4. NCBAAssist Portal
5. Visit a branch
6. Customer Relationship mailbox via Internet Banking
7. Live Chat (website or behind online banking)
8. Messenger Centre via Mobile App
9. Face to face/email (non-branch staff)
10. Manage My Card Portal - <https://managemycard.jncb.com/>
11. Social Media/ Traditional Media

### 4.2 Making a Complaint

Complaints can be made verbally or in writing and details entered in the CRM shall include the following information:

- a) Customer's name
- b) Telephone/email contact
- c) Date complaint received
- d) Details of complaint
- e) Date and/or time of complaint
- f) Method by which the complaint was submitted
- g) Account number /Financial account number for credit cards (when applicable) (format for writing credit card number shall conform to PCI guidelines)
- h) The name/position of the employee handling the complaint

Customers who are enabled for Personal Online Banking (POB) will also have the option of logging and tracking their complaints using the NCBAAssist portal, which is accessible via internet banking. Once the complaint is successfully logged, a reference number will be generated.

The portal is integrated with the CRM.

Customers with Credit Card disputes may log via the Manage My Card portal (<https://managemycard.jncb.com/>).

Additionally:

- a) All complaints are to be acknowledged within twenty-four (24) hours either in writing or by calling the customer.
- b) All responses should indicate the timeframe within which an initial response on the progress of the investigation will be provided.
- c) All complaints received must be logged in the CRM and the tracking number communicated to the customer.
- d) Some Credit Card Disputes are logged in Manage My Card Portal, Insurance complaints are logged in Sharepoint and will be resolved and responded to within the communicated Service Level Agreement (SLA) and timeframe ([Appendix 2](#)).
- e) Where a complaint cannot be resolved within the communicated SLA timeframe the customer should be advised, either in writing or by calling with an indication of the new expected timeframe for a response or resolution of the complaint.

- f) Ensure that all correspondence associated with the complaint are attached to the case in the complaints management system, to include final decisions taken.

### 4.3 Escalation Process and Criteria

A complaint should be escalated when it meets certain criteria that indicate it cannot be resolved at the current level or requires higher-level intervention. Here are some scenarios where escalation is appropriate:

#### 1. Urgency or Severity

- The issue poses a serious risk to customer safety, data security, or business operations.
- The complaint involves legal, regulatory, reputational, or compliance concerns.

#### 2. Repeated Unresolved Issues

- The customer has contacted NCB multiple times without a satisfactory resolution.
- The same issue keeps recurring despite previous attempts to fix it.

#### 3. High Value Customers

- The complaint comes from a high-value client or someone with strategic importance to the business.
- The customer relationship is at risk due to dissatisfaction.

#### 4. Policy or Authority Limitations

- The frontline team lacks the authority to make necessary decisions or exceptions.
- The resolution requires approval or action from a higher level.

#### 5. Customer Request

- The customer explicitly asks to speak with a manager or escalate the issue.

#### 6. Internal Process Failures

- The complaint reveals a breakdown in internal processes or systems that needs cross-functional attention.

Complaints shall be escalated to the complaints team within the Client Experience Unit via [complaintmanagementgroup@jncb.com](mailto:complaintmanagementgroup@jncb.com).

### 4.4 Investigating Complaints

Complaint investigations must be conducted in a thorough, objective, and timely manner to ensure that all relevant facts are identified, applicable policies and regulatory requirements are considered, and a fair and accurate resolution can be determined. The investigation process must include the following considerations:

1. Consider if it is necessary to obtain specialist or expert advice e.g. from Group Legal & Compliance Division, Enterprise Operations Division etc.
2. Consider whether information is needed from an external vendor e.g. bill payment merchants.
3. Determine the applicable standards/procedures/policies relating to the complaint.

The investigation process must include:

1. A review of the complaint details in CRM
2. Using the relevant applications to resolve the complaint
3. Moving the complaint to the “Resolved State” in CRM with appropriate notation of results of investigation
4. Updating CRM with all interactions (conversations and written correspondence) with the customer during the process

### 4.5 Resolving Complaints

Once the complaint has been investigated and resolved, the staff to whom the complaint has been assigned shall update CRM with appropriate resolution comments, to include:

- A copy of our response to the customer outlining the action taken to resolve the dispute and the organization’s final position regarding the matter. Indicate any matters raised by the customer which remain outstanding.
- Copies of all relevant correspondence and documentation is a regulatory requirement and therefore, must be included in CRM. Failure to do this may result in disciplinary action.

Options for appropriate resolution shall include, but not limited to:

1. Correcting the cause of the complaint and advising the customer within the stipulated SLA timeframe ([Appendix 2](#)) e.g. account linked, internet banking profile unlocked, bill payment updated at utility provider, account credited, address change completed
2. Dispatching an apology letter to the customer and copied to an external body (where required, especially for breached cases at the 45 business day timeframe)
3. Waiving/discounting fees and advising the customer (permission shall be granted by the responsible business unit, by someone at the appropriate level). See [Appendix 4](#) for Expenditure and Write-off Approval Guidelines
4. Delivering a recovery token to the customer in the interest of good customer relations, where necessary

Support Units shall thereafter flag the complaint “resolved” in CRM with appropriate notation.

### 4.6 Service Recovery

Service Recovery is the systematic approach to proactively solicit customer feedback while responding to complaints in a manner that creates loyalty.<sup>1</sup> It also involves utilizing information to

## Group Complaints Management Policy

make procedural and process improvements to win back customer goodwill, once it has been lost due to a service failure. Refer to Service Recovery Severity and Compensation Matrix in [Appendix 5](#).

Service Recovery is a four-stage process that:

1. Identifies failed service expectations
2. Resolves service problems
3. Identifies root-cause
4. Uses data for continuous improvement

In each branch or customer facing unit, the Service Quality Manager or equivalent has the responsibility of ensuring that complaints are effectively handled, to include managing the process of re-engaging customers who have had a less than satisfactory service experience. This includes:

1. Proactively identifying and reporting main service irritants to the Client Experience Unit
2. Ensuring proper escalation of complaints
3. Assessing complaints and making a determination regarding suitable restorative actions in keeping with guidelines
4. Tracking monetary value of recovery efforts and reporting information to the Client Experience Unit

### 4.7 COMMUNICATING WITH REGULATORY/EXTERNAL BODIES

Reports should be sent to regulatory and/or external bodies, to the extent required by law. These reports are sent by the Complaints Management Team. These bodies may include:

1. Bank of Jamaica (at 45 business days for breached cases)
2. Credit Bureaus
3. Financial Services Commission

#### Bank of Jamaica - Requirements

If a decision to resolve a customer's complaint has not been met within 45 days, the customer as well as the Bank of Jamaica shall be notified. The communication shall include:

- nature of the complaint
  - reason for the delay
  - expected completion time
1. Where a complaint is rejected in whole or in part, a reason for the rejection of the complaint shall be provided to the Bank of Jamaica in writing within 45 business days
  2. The acknowledgement of the complaint which must be completed within 5 business days shall state an indicative period within which an initial response to the complainant on the progress of the investigation shall be provided

## Group Complaints Management Policy

- Where a complaint cannot be resolved within the communicated Service Level Agreement (SLA) timeframe the customer should be advised on the day of breach of SLA, with an indication of the new expected timeframe for a response or resolution of the complaint.

### Risk Management Considerations

| Risk Category       | Potential Risk  | Mitigation Strategy   |
|---------------------|---|---|
| Regulatory          | Non-compliance with BOJ/FSC Guidelines                                | Automated compliance checks, System alerts, Weekly audits           |
| Reputation          | Negative publicity from unresolved complaints                         | Transparent communication, Public Relations response plans          |
| Operational         | High volume of unresolved complaints, Inconsistent complaint tracking | Employee training, workflow automation, regular data quality audits |
| Customer Experience | Loss of trust and customer attrition                                  | Root cause analysis, service recovery                               |
| Financial           | Penalties, compensation claim   | Defined approval workflow   |

### 4. Roles and Responsibilities

Complaints Management requires the active involvement of all employees with clear points of accountability for logging, tracking, monitoring and reporting.

| Role/Title                      | Responsibility  |
|---------------------------------|---|
| Board of Directors              | Review quarterly complaint trends   |
| Client Experience Unit          | <ul style="list-style-type: none"> <li>Provides oversight of the complaints framework, reporting (including regulatory), analytics</li> <li>Participate in and manage the process of logging, tracking, investigating and resolving complaints</li> <li>Review the complaints management standard operating guidelines framework periodically to ensure effectiveness and continued relevance</li> <li>Manage the Enterprise Service Recovery Programme (<a href="#">Appendix 5</a>)</li> </ul> |
| Complaints Management Team (L2) | <ul style="list-style-type: none"> <li>This team falls within the Client Experience Unit</li> <li>Owns the management of complaints from the initial report to resolution</li> <li>Ensures tracking, monitoring and reporting of complaints to internal groups and external bodies, such as regulatory entities</li> </ul>  |

|   |   |
|---|---|
|   | <ul style="list-style-type: none"> <li>• Conducts post resolution contact surveys</li> <li>• Supports periodic training of staff on complaints management</li> </ul>  |
| Support Units (L3)*                           | <ul style="list-style-type: none"> <li>• Handle high-risk, complex complaints, Technical investigations, resolution, and closure.</li> <li>• Retrieve and investigate complaints logged in the complaints management system</li> <li>• Ensure complaints are updated with appropriate narration before closure</li> <li>• Resolve complaints within Service Level Agreements</li> <li>• Close complaints which have been processed</li> <li>• Support units identify and appoint dedicated resources to investigate and resolve complaints.</li> <li>• List of support units are in <a href="#">Appendix 2</a></li> </ul> |
| All Employees, Branches, Customer Care Agents | <ul style="list-style-type: none"> <li>• Employees should ensure complaints are logged in the CRM irrespective of touch point</li> <li>• Complete the mandatory Customer Experience/Complaints online training course</li> <li>• Read the Complaints Management Standard Operating Guidelines on an annual basis and confirm via signature that the details have been read and understood.</li> </ul>   |

#### 5. Related Policies, Law and Regulation

- Banking Services (Deposit-Taking Institutions) (Customer Related Matters) Code of Conduct, 2016
- Credit Reporting Act
- NCB Customer Service Standards Manual
- Anti-Money Laundering/Counter-Financing of Terrorism (AML/CFT) Policy
- Internal Service Recovery Framework
- Data Protection Act

#### 6. Compliance and Monitoring

- The Complaints Management Team is responsible for monitoring complaints logged to ensure service level adherence. Any rejected cases and breaches of 45 days and over must be reported to the Bank of Jamaica.

## Group Complaints Management Policy

- Daily automated case status generated from the CRM are dispatched for complaint resolution timelines.
- Annual review by the Compliance Division
- Post-resolution surveys should be administered for continuous improvement

### 7. Non-Compliance

Non-compliance with this policy may result in :

- Disciplinary actions as outlined in the disciplinary policy
- Coaching and training interventions
- Regulatory escalation if breaches occur

### Review and Updates

This Policy shall be reviewed at least once each year, or as needed based on material changes to the risk appetite of the institution, any legal or regulatory changes. Policy revisions to be approved by the Board of Directors

### Effective Date and Review Cycle

| Effective Date | Next Review Date |
|----------------|------------------|
| May 2026       | May 2027         |


### Approval

Approved by:



\_\_\_\_\_  
Perrin Gayle  
Executive Vice President, Retail Banking

\_\_\_\_\_  
DATE

  
[Sheree Martin \(May 4, 2026 12:47:13 CDT\)](#)

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Sheree Martin  
Interim CEO, National Commercial Bank

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04-May-2026

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DATE

# Group Complaints Management Policy

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NCB Board

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DATE

## Appendices

### Appendix 1



NCB Customer  
Experience Manual 20

Customer Service Manual

### Appendix 2

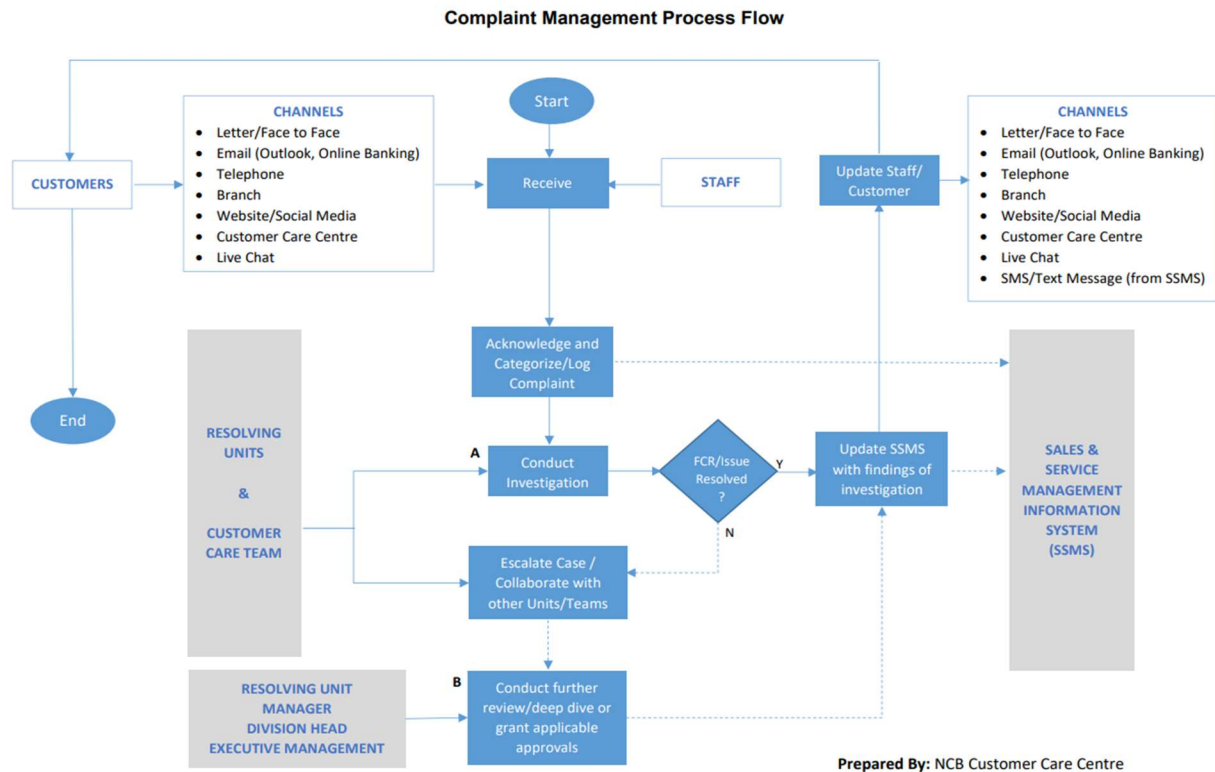


SSMS List of  
Complaints\_Current

Service Level Agreement for Resolving Units

# Group Complaints Management Policy

## Appendix 3



## Appendix 4



Expenditure\_and\_Write-off\_Approval\_

Expenditure and Write-off Approval Guidelines

## Appendix 5

### Service Recovery Severity and Compensation Matrix

| Severity Level    | Description                             | Examples                         | Resolution Timeline         | Recourse/Compensation Authority  |
|-------------------|---|----------------------------------|-----------------------------|--|
| <b>Low Impact</b> | Minor inconvenience, no financial loss. | Delay in dispatch of credit card | Within 3 days of escalation | Apology, fee waiver (up to \$2000). Goodwill token, Management authorized. |

Group Complaints Management Policy

| <b>Severity Level</b>  | <b>Description</b>  | <b>Examples</b>  | <b>Resolution Timeline</b>  | <b>Recourse/Compensation Authority</b>                          |
|------------------------|---|--|-----------------------------|---|
| <b>Moderate Impact</b> | Service delay or small error causing inconvenience.           | Delayed transfer, incorrect posting, Bill payment duplication  | Within 3 days of escalation | Refund fees (up to \$100), goodwill token. Management Approval. |
| <b>High Impact</b>     | Significant inconvenience, financial loss, reputational risk. | Wrongful claim denial, fraud error, lack of action by employee | Within 3 days of escalation | Monetary reimbursement where necessary, EVP Approval.           |
| <b>Severe Impact</b>   | Major regulatory/reputational risk, systemic error.           | Data breach, system-wide outage.                               | Within 24 hours             | Compensation, regulatory reporting. EVP approval.               |